

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

196

GEORGE A. JACKSON, et al.,	:
	:
Plaintiffs,	:
	:
v.	:
	C.A. No. 05-823-***
STANLEY TAYLOR, et al.,	:
	:
Defendants.	:

PLAINTIFF GEORGE A. JACKSON'S WRITTEN DEPOSITIONS
TO DEPOSE DEFENDANT WENSTON WHITE

Plaintiff George A. Jackson, pro se, hereby depose defendant upon
Order of the Court:

GENERAL OBJECTIONS

1. Plaintiff objects to the deposing of defendants to the extent
of written depositions. Just for the record.

WRITTEN DEPOSITIONS

1. How long have you been employed with the Delaware Department of Corrections?

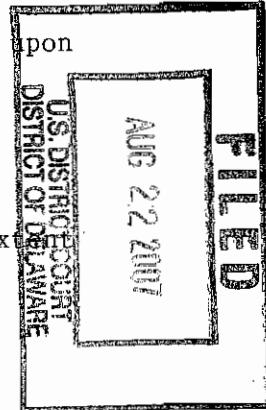
2. Are you under the influence of any medication?

3. Have you had a chance to review the Amend Complaint, your "Response to Plaintiffs' Interrogatories", and any previous statements you given to defendants' counsel or any one else in connection with this case before coming here today?

4. Have you had a chance to meet and discuss the case with defendants' counsel?

5. Do you realize that you are under oath, just as if you were at trial testifying?

6. Is there any reason you can't give your best testimony today?



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7. Have you ever completed any accredited program on food safety, personal hygiene, preparation cooking, proper cleaning and sanitizing before July 1, 2005? If yes, please state the name of the accredited program and the date of completion.

8. Do you agree or disagree. When a person is working under conditions that exhibits excessive heat and high humidity, a person body works at a much higher stress level due to the lack of oxygen in the air?

9. Since you have worked at the SCI kitchen, when an inmate complain of any illness, does the SCI food service staff diagnose the inmate worker, or is he refer to the medical unit to be examined by the proper authorized personnel?

10. In your "Response no. 2 to Plaintiffs' Interrogatories", you indicated, "Yes". Did you make a general assessment of the inmate workers complaint before notifying Defendant Senato and the SCI Maintenance Department?

11. During the hot summer months when temperature rise and/or exceeds 100 degree, what precautionary instructions are told to the inmate workers during these hot days?

12. Are you aware there are only one (1) toilet seat for 22-25 inmate workers to use which forces some workers to wait long periods, or even relieving themselves in the floor drain in the trayroom area?

13. Since the filing of the institutional grievance and the lawsuit, have the work conditions improved or remained the same?

14. When inmate kitchen workers was housed in the air condition cool Merit building, if they refused to work or get fired, would that inmate received a major disciplinary report (class I), and immediately moved to a lesser desireable housing unit?

15. On July, 20, 2005, an inmate reportedly found a parasite (larva) in his Beef Cube Streak, after an intense investigation which included an inspection of the kitchen area. Was any replacement vermin control equipment such as bug lights ordered for the kitchen area?